EXHIBIT B

DECLARATION OF HARRI HURSTI

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct:

1. My name is Harri Hursti. I am over the age of 21 and competent to give this testimony. The facts stated in this declaration are based on my personal knowledge, unless stated otherwise.
2. This declaration supplements my prior declarations and I stand by the statements in those declarations.
3. I have been in Sioux Falls, South Dakota since the 9th of August 2021 to participate in "Mike Lindell's Cyber Symposium", which took place from August 10th to 12th.
4. During the event, the organizers of the event made copies of forensic images of 3 separate Dominion Election Management System Server installations available to me and others in attendance.
5. The organizers did not give consistent explanations for how the images were made, where they were made, or any other details.
6. Two of the images appear to have originated from Mesa County, Colorado and one from Antrim County, Michigan.
7. The forensic image headers from the Antrim County image are shown in Exhibit 1.
8. The forensic image headers from the Mesa County images are shown in Exhibit 2 and Exhibit 3.
9. All three images were additionally made available globally for download by the public over a peer-to-peer file sharing system called BitTorrent. At least one of the speakers of the symposium, Ron Watkins a.k.a. "CodeMonkeyZ", posted links to download the files (https://t.me/s/CodeMonkeyZ) on a social media platform where he has almost 400,000 followers. Attendees at the event mentioned that "thousands" of people were downloading the files.
10. In my professional opinion, global public release of the server images lowers the barrier to planning an attack against any election management system running this Dominion software, and therefore makes future attacks against such systems more likely.

I declare under penalty of the perjury laws of the State of Colorado and the United States that the foregoing is true and correct and that this declaration was executed this 13th day of August, 2021 in Sioux Falls, South Dakota.

Exhibit 1

┌─[scofield@parrot]─[/media/scofield/easystore/Antrim/C1-Election-Management-Server/SDA]
└──- $ewfinfo SSA1722_C1-Election_Server-SDA.E01
ewfinfo 20140807

Acquiry information
        Case number: SSA1722
        Description: Dell Precision Tower 3420
        Examiner name: Greg Freemyer
        Evidence number: C1-Election_Server-SDA
        Notes: Drive 1 of 2
        Acquisition date: Sun Dec 6 04:50:18 2020
        System date: Sun Dec 6 04:50:18 2020
        Operating system used: Linux
        Software version used: 20140608
        Password: N/A
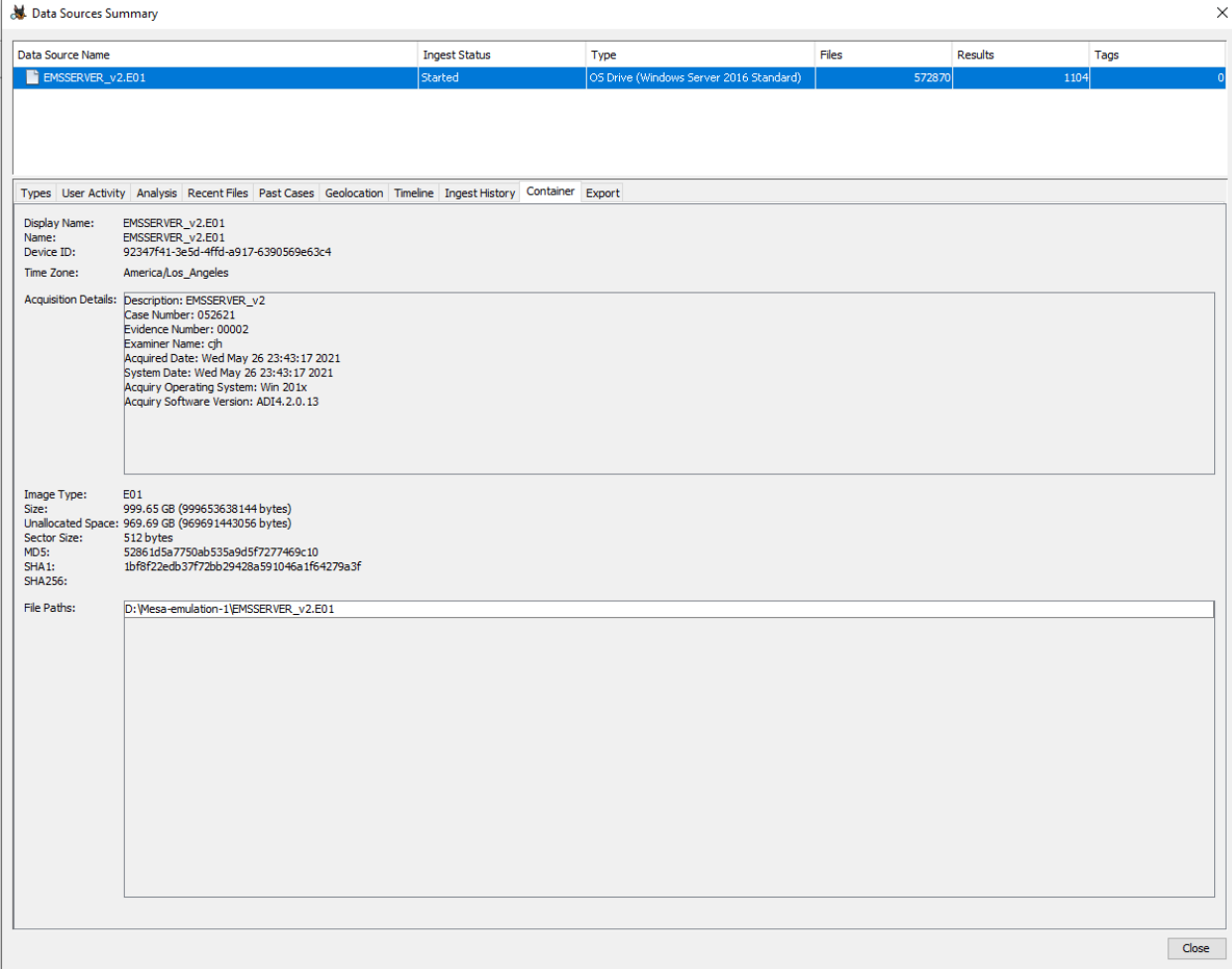   Model: ST500LM021-1KJ152
        Serial number: W62HL9M8

EWF information
        File format: EnCase 6
        Sectors per chunk: 64
        Error granularity: 1
        Compression method:deflate
        Compression level: no compression
        Set identifier: 1c03776e-207c-034b-8a0b-8239890c80d2
        Is corrupted: yes

Media information
        Media type: fixed disk
        Is physical: yes
        Bytes per sector: 512
        Number of sectors: 976773168
        Media size: 465 GiB (500107862016 bytes)

Exhibit 2

Data Sources Summary					✕
Data Source Name	Ingest Status	Type	Files	Results	Tags
EMSSERVER_v2.E01	Started	OS Drive (Windows Server 2016 Standard)	572870	1104	0

Types | User Activity | Analysis | Recent Files | Past Cases | Geolocation | Timeline | Ingest History | **Container** | Export

Display Name: EMSSERVER_v2.E01
Name: EMSSERVER_v2.E01
Device ID: 92347f41-3e5d-4ffd-a917-6390569e63c4
Time Zone: America/Los_Angeles

Acquisition Details: Description: EMSSERVER_v2
                      Case Number: 052621
                      Evidence Number: 00002
                      Examiner Name: cjh
                      Acquired Date: Wed May 26 23:43:17 2021
                      System Date: Wed May 26 23:43:17 2021
                      Acquiry Operating System: Win 201x
                      Acquiry Software Version: ADI4.2.0.13

Image Type: E01
Size: 999.65 GB (999653638144 bytes)
Unallocated Space: 969.69 GB (969691443056 bytes)
Sector Size: 512 bytes
MD5:   52861d5a7750ab535a9d5f7277469c10
SHA1:   1bf8f22edb37f72bb29428a591046a1f64279a3f
SHA256:

File Paths: D:\Mesa-emulation-1\EMSSERVER_v2.E01

Close

Exhibit 3

Data Sources Summary

Data Source Name	Ingest Status	Type	Files	Results	Tags
EMSSERVER.E01	Started	OS Drive (Windows Server 2016 St...	454205	1238	0

Types | User Activity | Analysis | Recent Files | Past Cases | Geolocation | Timeline | Ingest History | **Container** | Export

Display Name: EMSSERVER.E01
Name: EMSSERVER.E01
Device ID: 61938fb4-a1fb-4122-8ba6-b638dadcaa5d

Time Zone: America/Los_Angeles

Acquisition Details: Description: EMSSERVER
                       Case Number: 052321
                       Evidence Number: 00003
                       Examiner Name: cjh
                       Acquired Date: Sun May 23 22:30:36 2021
                       System Date: Sun May 23 22:30:36 2021
                       Acquiry Operating System: Win 201x
                       Acquiry Software Version: ADI4.2.0.13

Image Type: E01
Size: 999.65 GB (999653638144 bytes)
Unallocated Space: 893.79 GB (893789585200 bytes)
Sector Size: 512 bytes
MD5:   3d7cf05ca6e42db765bf5c15220c097d
SHA1:   eab06a7ea23586de2746b9142461717e075f5c9f
SHA256:

File Paths: D:\Mesa-emulation-1\EMSSERVER.E01

Close